law offices 3883 Howard Hughes Parkway Suite 1100 Las Vegas, Nevada 89169

2022 for the following reasons:

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1.	Plaintiffs filed their response to the Motion on December 10, 2021, though Wells
	Fargo's counsel was inadvertently terminated from the Court's docket and did no
	receive electronic filing notices on December 10 (counsel realized this on December 13
	and the electronic filings notices resumed on December 14).

- 2. The Motion, and thus, the Plaintiffs' response thereto, involves numerous separate issues to address. The additional time is requested to ensure that (1) with many individuals out of the office in the next couple of weeks due to the holidays, counsel can sufficiently confer with Wells Fargo, and (2) by doing so, the parties may be able to resolve a couple more of the topics at issue in the meantime.
- 3. This extension will not cause any delay as the hearing on the Motion is not scheduled to take place until January 27, 2022.

DATED this 13th day of December, 2021.

SNELL & WILMER L.L.P.

## SNELL & WILMER L.L.F

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## AXS LAW GROUP, PLLC

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IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 12/15/2021

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1 **CERTIFICATE OF SERVICE** 2 I hereby certify that on December 14, 2021, I electronically transmitted the 3 STIPULATION AND ORDER FOR EXTENSION OF TIME TO REPLY IN SUPPORT OF 4 WELLS FARGO BANK, N.A.'S MOTION FOR PROTECTIVE ORDER RE 30(b)(6) 5 **DEPOSITION** with the Clerk of Court for the U.S. District Court, District of Nevada by using the 6 Court's CM/ECF system for filing. Participants in the case who are registered CM/ECF users will 7 be served by the CM/ECF system. 8 Mark J. Connot 9 Rex D. Garner FOX ROTHSCHILD LLP 10 One Summerlin 1980 Festival Plaza Dr., Suite 700 11 Las Vegas, Nevada 89135 mconnot@foxrothchild.com 12 rgarner@foxrothchild.com 13 Attorneys for Jose Rico 14 Anthony P. Sgro Colleen N. Savage 15 Kelly B. Stout SGRO & ROGER 720 S. 7<sup>th</sup> Street, 3rd Floor 16 Las Vegas, Nevada 89101 17 tsgro@sgroandroger.com csavage@sgroandroger.com 18 kstout@sgroandroger.com 19 Courtney Caprio Andrew E. Beaulieu 20 Jeffrey W. Gutchess Irina R. Sadovnic 21 AXS LAW GROUP, PLLC 2121 NW 2<sup>nd</sup> Avenue, Suite 201 22 Miami, Florida 33127 courtney@axslawgroup.com 23 andy@axslawgroup.com jeff@axslawgroup.com 24 irina@axslawgroup.com 25 Attorneys for Plaintiffs 26 s/Jeanne Forrest An employee of SNELL & WILMER L.L.P. 27 28